



Michael J. Lauricella

mlauricella@archerlaw.com
201-498-8545 (Ext. 7545) Direct
201-342-6611 Direct Fax

Archer & Greiner, P.C.
630 Third Avenue
New York, NY 10017
212-682-4940 Main
212-682-4942 Fax
www.archerlaw.com

July 26, 2018

VA ECF

Honorable Gabriel W. Gorenstein, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Ritani, LLC v. Harout Aghjayan, et. al.
Civil Action No. 1:11-cv-08928 (CWG)

Dear Judge Gorenstein:

My firm represents the Defendants in the above-referenced action. We write, jointly with Plaintiff's counsel, to provide Your Honor with the joint report on the status of discovery that is due July 26, 2018. Mr. Reuber and I had a meet and confer the week of July 16, 2018 to discuss certain discovery issues and have continued to correspond via email over certain discovery issues and clarifications.

Mr. Reuber has identified additional documents from the Edgewater facility by production number that Ritani asserts were not previously produced. To facilitate our review, Mr. Reuber is going to provide copies of those documents to me. Thereafter, we have agreed to meet and confer as to the scope of documents from the Edgewater facility that Ritani asserts have not been produced that should have been produced.

Additionally, Defendants provided Ritani with an explanation on why the "restored" documents from a January 2012 email were not produced prior to the last discovery conference. Ritani is reviewing the explanation to confirm there is no issue.

Finally, Mr. Reuber has requested that certain documents from the restored "FEB17" folder be reclassified such that he can share them with his client. Defendants have asked for more specific information on what documents Mr. Reuber wants to reclassify and the basis thereof.

July 26, 2018

Page 2

Counsel for the parties will have a meet and confer after the requested information is exchanged. We will provide Your Honor with another status report in three weeks.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,
/s Michael J. Lauricella
Michael J. Lauricella

cc: Cameron S. Reuber, Counsel for Plaintiff (Via ECF)

214857338v1